W.Q - Comments

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By: Howe, Carol

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Topic: your 12/18 memo on water qu

Sent: 01-07-97

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Mail*Link>

your 12/18 memo on water quality

>Carol, John D: The following was sent today. Ted is obviously still not happy with the lack of scientific support for the actions. It seems to me we must try harder to explain that we have no intention whatever of spending

money implementing actions without adequate study. Our priorities as listed

now are entirely subject to change based on further investigation. As you see, he is also not comfortable with setting a salinity goal that might not be practical to meet. I would be interested in your thoughts on how best to

address Ted's comments.

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>Date: Tue, 07 Jan 1997 12:54:31 -0800

>From: Ted Roefs <TROEFS-IBR21E@ibr2gw80.mp.usbr.gov>

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>Subject: your 12/18 memo on water quality

>I've finally gotten around to reviewing this memorandum. I am having >some trouble coming up with any comments that will be useful to the >process that appears to have been defined. The reason for this is >that there is difficulty in connecting the solutions proposed to the >goals of the process. Consider the high priority action .
>"Implementation of Integrated Pest Management in surface drainage >source areas, especially for parameters of concern. (Action 11, 32B)" >If this is implemented, pesticide loads to the Delta and tributary >streams will be reduced. Some of these pesticides have been shown to >be toxic to test organisms at some times and places. The test >organisms are not the species of most interest to those concerned >about ecosystem health. It is entirely possible that this program >could be implemented and that it would have absolutely no effect on, >say, salmon populations. My point is that the science does not exist >to warrant the expenditure of resources that might be made.

>Unfortunately, this comment is not unique to this measure. Other >high priority actions appear not to have been subjected to the test: >do we know enough about the science to say that the action will have >the desired effect? The water quality committee is a mixture of >technical expertise and stakeholder interests. What the committee >should thinking about is how to bring more specific scientific >expertise to each of the measures being considered as high priority. >In some instances, this might be done by finding specific expertise >in the academic community to evaluate the proposed measures. In

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>other instances, there may simply not be enough knowledge to evaluate >the proposed measure. If that is true, the action should not be >characterized as "high priority."

>Your memo also mentions target ranges for parameters. As I commented >earlier, I don't see the utility of listing 0.7 EC as a target for >agricultural water quality. In those areas where the water quality >is worse than this, it would take heroic measures such as desalting >or building a San Joaquin Valley Drain to make any significant >improvements.

Parget

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